



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



292017

MAR 05 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF

**RRG/Clayton Chemical Co.
Site**

To:

Re: CERCLA 106, 42 USC Section 106 Unilateral Administrative Order for Performance of Work by Non-cooperating Tier I Potentially Responsible Parties at RRG/Clayton Chemical Company Superfund Site, 1 Mobile Avenue, Sauget, IL (St. Clair County)

Dear Sir or Madam:

Enclosed please find a unilateral Administrative Order issued by the U.S. Environmental Protection Agency ("U.S. EPA") under Section 106 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"), 42 U.S.C. §9601, et seq.

Please note that the Order allows an opportunity for a conference if requested within 3 business days after issuance of the Order, or if no conference is requested, an opportunity to submit comments within 7 business days of issuance of the Order.

If you have any questions regarding the Order, feel free to contact Tom Turner, Assistant Regional Counsel, at (312) 886-6613 or Kevin Turner, On-Scene Coordinator, at (618) 997-0115.

Sincerely yours,

Richard C. Karl, Director
Superfund Division

Enclosure

cc: Mr. Gary King, IEPA, Superfund Program Manager

bcc: Docket Analyst, ORC (C-14J)

T. Turner, ORC (C-14J)

Kevin Turner, OSC, (SE-5J) or (SE-GI) or (B-2)

John Maritote, EESS (SE-5J)

Bill Ryczek, EESS (SE-5J)

Fushi Cai, EESS (SE-5J)

Jeff Kelley, Public Affairs (P-19J) w/out attachments

Michael T. Chezik, Department of Interior

Betty White, PAAS (MF-10J)

Records Center (SMR-7J)

U.S. Department of Interior

Mr. Michael T. Chezik, Regional Environmental Officer

Philadelphia Region

Custom House Room 244

200 Chestnut Street

Philadelphia, PA 19106

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 5

IN THE MATTER OF:)	Docket No.	V-W- '08 -C-893
)		
RRG/Clayton Chemical Co.,)	ADMINISTRATIVE ORDER	
Sauget, Illinois)	PURSUANT TO SECTION 106(a)	
)	OF THE COMPREHENSIVE	
)	ENVIRONMENTAL RESPONSE,	
Respondents:)	COMPENSATION, AND	
)	LIABILITY ACT OF 1980,	
Listed in Attachment 2)	AS AMENDED, 42 U.S.C.	
)	§9606(a)	

I. JURISDICTION AND GENERAL PROVISIONS

This Order is issued pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9606(a), and delegated to the Administrator of the United States Environmental Protection Agency ("U.S. EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, and further delegated to the Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and to the Director, Superfund Division, Region 5, by Regional Delegation Nos. 14-14-A and 14-14-B.

This Order pertains to property located at 1 Mobile Avenue, Sauget, Illinois (the "RRG/Clayton Chemical Co. Superfund Site" or the "Site"). This Order requires the Respondents to conduct removal activities described in the attached Work Plan Amendment for the RRG/Clayton Chemical Company Superfund Site to abate an imminent and substantial endangerment to the public health, welfare or the environment that may be presented by the actual or threatened release of hazardous substances at or from the Site.

U.S. EPA has notified the State of Illinois of this action pursuant to Section 106(a) of CERCLA, 42 U.S.C. §9606(a).

II. PARTIES BOUND

This Order applies to and is binding upon Respondents and Respondents' heirs, receivers, trustees, successors and assigns. Any change in ownership or corporate status of Respondents including, but not limited to, any transfer of assets or real or personal property shall not alter such Respondents' responsibilities under this Order. Respondents are jointly and severally liable for carrying out all activities required by this Order. Compliance or noncompliance by one or more

Respondents with any provision of this Order shall not excuse or justify noncompliance by any other Respondent.

Respondents shall ensure that their contractors, subcontractors, and representatives comply with this Order. Respondents shall be responsible for any noncompliance.

III. FINDINGS OF FACT

Based on available information, including the Administrative Record in this matter, U.S. EPA hereby finds that:

- i. The RRG/Clayton Chemical Site is located at 1 Mobile Avenue, Sauget, Illinois. The Site lies in a flood plain protected by a river levee. The Site is approximately 7 acres in size and is located in a highly industrialized area. (Map of site is attached with Work Plan Amendment as Attachment 1).
- ii. Prior to 1961, the Site was owned by GM&O Railroad and the Site was used to repair and maintain railroad equipment.
- iii. In 1961, Clayton Chemical Company leased the facility to recycle and recover used solvents and waste oil.
- iv. On May 12, 1981, the Village of Sauget, Illinois deeded the Site property to the Clayton Chemical Company. Clayton Chemical Company continued operating a waste oil and solvent recycling business from the Site. In November 1996, Clayton Chemical Company discontinued operations at the Site.
- v. Between 1996 and 1998, the Site was operated as a waste oil and spent solvents recycling and recovery business by a new entity, the Resource Recovery Group (RRG).
- vi. The Illinois Environmental Protection Agency's (IEPA) Resource Conservation and Recovery Act (RCRA) hazardous waste records for the Site indicated that between 1995 and 1998, the RRG/Clayton Chemical facility received hazardous substances for processing.
- vii. In 1998, IEPA denied the RCRA permit of RRG, and the RRG/Clayton Chemical facility ceased acceptance of hazardous substances.
- viii. The hazardous substances shipped to the Site (between 1995 and 1998) as

identified in IEPA RCRA hazardous waste records included caustics, corrosives, ignitable hazardous liquids and solids, solvents, acids, liquid fuels, and dry cleaning waste materials.

- ix. In February 2001, IEPA referred the Site to U.S. EPA.
- x. During June 5-7, 2001, U.S. EPA conducted a site assessment at the Site. Twenty-two soil samples and ten groundwater samples were taken during the site assessment. Sampling of some of the containerized liquids at the Site revealed that they still contained hazardous substances as described in the IEPA RCRA hazardous waste manifest records identified in paragraph vi. The U.S. EPA site assessment also indicated Site soil contamination based upon the release of the types of hazardous substances (or residual remainders) referenced in paragraph viii.
- xi. Based upon review of IEPA's RCRA hazardous substance manifest records for 1995-1998 and the site assessment, as referenced in paragraphs vi and x, on March 6, 2002, U.S. EPA issued a General Notice Letter to generator parties designated as Potentially Responsible Parties (PRPs) at the Site.
- xii. In Fall 2002, Mr. Dennis Ballinger of Dennis Ballinger Real Estate/Globe Tax Service, Decatur, Illinois, purchased a Sheriff's Tax Sale deed to the Site property in a St. Clair County (IL) tax sale.
- xiii. On October 2, 2002, U.S. EPA issued a CERCLA Section 106 Administrative Order on Consent (AOC) for removal of hazardous liquid substances stored in drums, tanks, containers and other vessels at the Site. The removal was performed by a PRP liquids removal group composed of some of the generator parties identified in paragraph xi. The PRP liquids removal group performed the removal between 2002 and 2004.
- xiv. Pursuant to the October 2002 AOC, the PRP liquids removal group also researched all available Site removal records and additional IEPA records and created an August 2004 PRP waste report for the present soil removal action. Records from on-Site and further IEPA waste shipment records (for 1987 to 1998), and 2002 St. Clair county tax records, revealed that the generator or owner/operator parties identified in paragraphs xi and xii sent waste to or maintained an ownership or operational interest in the Site facility. Additionally, the August 2004 PRP waste report expanded the PRP list for the Site. U.S. EPA reviewed the August 2004 report and developed the November 2004 list of Respondents that received CERCLA General Notice Letters for the present soil removal action.

- xv. On November 22, 2004 and February 15, 2005, U.S. EPA issued General Notice Letters to Respondents identified as generator or owner-operator PRPs (as described in paragraph xiv) for the hazardous soil removal planned for the Site. The generators in this group were designated 'Tier I' generators, because they had sent the largest amounts of hazardous waste of record (at least 75,000 gallons each) to the Site during its active phase.
- xvi. On September 27, 2005, U.S. EPA issued General Notice Letters to Respondent generators identified as having sent smaller amounts (between 10,000 and 74,999 gallons) of hazardous waste to the Site during its active phase. This group was designated 'Tier II' generators.
- xvii. On October 27, 2005, U.S. EPA issued a CERCLA Administrative Settlement Agreement and Order on Consent ("AS AOC") for removal of hazardous soils at the Site. The removal is to be performed by a PRP soils removal group composed primarily of the Tier I Respondents identified in paragraph xv. This group is known as the 'Performing Parties'. Some Tier II Respondents elected to participate in the AS AOC as well, as 'Nonperforming Parties'.
- xviii. A number of Tier I Respondents refused to cooperate with U.S. EPA and would not aid in the on-going removal action. These parties, that meet the requirements of CERCLA Section 106 for liability and viability, are recipients of this Order.
- xix. On February 9, 2006, U.S. EPA amended the October 27, 2005 AS AOC, allowing further Tier I and II Respondents to participate in the settlement. The RRG/Clayton Chemical Co. Site continues to present the threat of release of hazardous substances into the environment.
- xx. On January 30, 2008, U.S. EPA again amended the AS AOC to add two more participating Tier I and II Respondents, and amended the AS AOC Work Plan to require further removal activities involving implementation and maintenance of a cap.

IV. CONCLUSIONS OF LAW AND DETERMINATIONS

Based on the Findings of Fact set forth above, and the Administrative Record supporting these removal actions, U.S. EPA determines that:

1. The RRG/Clayton Chemical Company Site is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

2. Caustics, corrosives, ignitable hazardous liquids and solids, solvents, acids, liquid fuels, and dry cleaning waste materials are "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

3. Each Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. §9601(21).

4. Respondents Ameren CIPS (f/k/a Central Illinois Public Service Co.), Coleman Chemical & Oil, Don V. Davis Co., Diosynth, Inc., Keystone Consolidated Industries, Inc., Laidlaw Environmental Services, Inc. (f/k/a Safety-Kleen (ts), Inc.), Lyon Metals Products, LLC, Sigma Chemical Co., Silgan Containers Corp., Steelcote Manufacturing Co., and Titan Wheel Corp. are persons who arranged for disposal or transport for disposal of hazardous substances at the RRG/Clayton Chemical Co. Site. Respondents are therefore liable persons under Section 107(a) of CERCLA, 42 U.S.C. §9607(a).

5. The conditions described in the Findings of Fact above constitute an actual or threatened "release" into the "environment" as defined by Sections 101(8) and (22) of CERCLA, 42 U.S.C. §§9601(8) and (22).

6. The conditions present at the Site constitute a threat to public health, welfare, or the environment based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan, as amended ("NCP"), 40 CFR Part 300. These factors include, but are not limited to, the following:

- (1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants; this factor is present at the Site due to the existence of RCRA metals, lead, chromium, arsenic in the soil, PCBs in the soil, and historic leakage from containerized hazardous and ignitable materials into the soil of the Site.

The June 2001 Site Assessment revealed several areas where bulk waste was dumped directly into the ground. During the June 2001 Site Assessment, 59 test pits were dug throughout the property.

The laboratory analytical results for both soil and groundwater, as stated above, further documented that actual releases to the environment have occurred.

- (2) Actual or potential contamination of drinking water supplies or sensitive ecosystems; this factor is present at the Site due to the existence of porous sandy area soils that are suitable for run-off and could move contaminants to groundwater or drinking water.

- (3) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate; this factor is present at the Site due to the existence of RCRA metals, ignitable compounds and PCBs in Site soils.

Analytical results indicated that both surface and subsurface soils at the RRG/Clayton Chemical site have been impacted by elevated concentrations of various heavy metals, PCBs, and ignitable compounds. The contamination exists on the ground surface where it may easily migrate via surface water runoff or become airborne. Although an extensive geological study of the site has not been performed, area soils appear to be of a porous, sandy nature, which would facilitate contamination migration to groundwater.

- (4) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released; this factor is present at the Site due to the existence of the potential for heavy rains and large-scale area flooding in the Mississippi River flood plain.

The June 2001 Site Assessment documented that surface contamination could migrate off site via heavy rains, flooding or severe winds. Heavy rains may cause further migration of contaminants off site. Winds could cause dust particles containing heavy metals and PCBs to migrate off-site. These weather conditions could result in a continued release of the hazardous wastes described herein to the surrounding soil, air and surface water.

- (5) Threat of fire or explosion; this factor is present at the Site due to the existence of remaining ignitable RCRA hazardous waste materials in solid form, ignitable soil compounds, and the potential for severe wind storms or tornados.

- (6) The unavailability of other appropriate federal or state response mechanisms to respond to the release; this factor supports the actions required by this Order at the Site because of the referral in February 2001 of the Site from IEPA to U.S. EPA.

IEPA requested U.S. EPA, Region 5 assistance with the RRG/Clayton Chemical site. The State of Illinois does not have

the funds to undertake removal of the hazardous wastes and hazardous substances found at this Site.

7. The actual or threatened release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. §9606(a).

8. The removal actions required by this Order are necessary to protect the public health, welfare, or the environment, and are not inconsistent with the NCP and CERCLA.

V. ORDER

Based upon the foregoing Findings of Fact, Conclusions of Law, Determinations, and the Administrative Record for this Site, U.S. EPA hereby orders that Respondents perform the following actions:

1. Notice of Intent to Comply

Respondents shall notify U.S. EPA in writing within 3 business days after the effective date of this Order of Respondents' irrevocable intent to comply with this Order. Failure of each Respondent to provide such notification within this time period shall be a violation of this Order.

2. Designation of Contractor, Project Coordinator, and On-Scene Coordinator

Respondents shall perform the removal actions themselves or retain a contractor to implement the removal actions. Respondents shall notify U.S. EPA of Respondents' qualifications or the name and qualifications of such contractors, whichever is applicable, within 5 business days of the effective date of this Order. Respondents shall also notify U.S. EPA of the name and qualifications of any other contractors or subcontractors retained to perform work under this Order at least 5 business days prior to commencement of such work. U.S. EPA retains the right to disapprove of the Respondents or any of the contractors and/or subcontractors retained by the Respondents. If U.S. EPA disapproves a selected contractor, Respondents shall retain a different contractor within 2 business days following U.S. EPA's disapproval and shall notify U.S. EPA of that contractor's name and qualifications within 3 business days of U.S. EPA's disapproval.

Within 5 business days after the effective date of this Order, the Respondents shall designate a Project Coordinator who shall be responsible for administration of all the Respondents' actions required by the Order and submit the designated coordinator's name, address, telephone number, and qualifications to U.S. EPA. To the greatest extent possible, the Project Coordinator shall be present on-site or readily available during site work. U.S. EPA retains the right to disapprove of any Project Coordinator named by the Respondents. If U.S. EPA disapproves a selected Project

Coordinator, Respondents shall retain a different Project Coordinator within 3 business days following U.S. EPA's disapproval and shall notify U.S. EPA of that person's name and qualifications within 4 business days of U.S. EPA's disapproval. Receipt by Respondents' Project Coordinator of any notice or communication from U.S. EPA relating to this Order shall constitute receipt by all Respondents.

The U.S. EPA has designated Kevin Turner of the Emergency Response Branch, Region 5, as its On-Scene Coordinator ("OSC"). Respondents shall direct all submissions required by this Order to the OSC at 8588 Rt. 148, Marion, IL 62959, by regular mail. Respondents shall also send a copy of all submissions to Thomas Turner, Assistant Regional Counsel, 77 West Jackson Boulevard, C-14J, Chicago, Illinois, 60604-3590. Respondents may also communicate with U.S. EPA by electronic mail. All Respondents are encouraged to make their submissions to U.S. EPA on recycled paper (which includes significant postconsumer waste paper content where possible) and using two-sided copies.

3. Work to Be Performed

Respondents shall perform, at a minimum, the following response activities:

- a. Planning, construction and implementation of a cap for hazardous soils remaining on Site, pursuant to Section 2.3 of the Work Plan Amendment. The cap shall be located in the Site main yard, as depicted in the Work Plan Amendment. The cap shall consist of a low permeability cover over the impacted soil area; shall prevent direct soil contact; shall limit the infiltration of rainfall and snowmelt through the existing soil profile; shall minimize the leaching potential of impacted subsurface soils; shall serve as a vapor barrier for any volatile compounds in the soil matrix; and, shall provide long-term protection against erosion and subsequent transportation of contaminants.
- b. Production of a 90% design for the cap. The draft work plan for this Order shall establish a schedule for the submittal of a 90% design.
- c. Planning and implementation of post-cap installation Operations and Maintenance ("O & M") activities at the Site, pursuant to Section 2.3 of the Work Plan Amendment. Respondents shall produce an O & M manual addressing the cap as built.

3.1 Work Plan and Implementation

Within 10 business days after the effective date of this Order, the Respondents shall submit to U.S. EPA for approval a draft Work Plan for the proposed performance of the removal activities set forth above. The draft Work Plan shall provide a description of, and an expeditious schedule for, the activities required by this Order.

U.S. EPA may approve, disapprove, require revisions to, or modify the draft Work Plan. If U.S. EPA requires revisions, Respondents shall submit a revised draft Work Plan within 7 business days of notification. Respondents shall implement the Work Plan as finally approved in writing by U.S. EPA in accordance with the schedule approved by U.S. EPA. Once approved, or approved with modifications, the Work Plan describing performance of the Work, the schedule, and any subsequent modifications shall be fully enforceable under this Order. Respondents shall notify U.S. EPA at least 48 hours prior to performing any on-site work pursuant to the U.S. EPA approved Work Plan.

Respondents shall not commence or undertake any removal actions at the Site without prior U.S. EPA approval.

3.2 Health and Safety Plan

Within 10 business days after the effective date of this Order, the Respondents shall submit a plan for U.S. EPA review and comment that ensures the protection of the public health and safety during performance of on-site work under this Order. This plan shall comply with applicable Occupational Safety and Health Administration ("OSHA") regulations found at 29 CFR Part 1910. If U.S. EPA determines it is appropriate, the plan shall also include contingency planning. Respondents shall incorporate all changes to the plan recommended by U.S. EPA, and implement the plan during the pendency of the removal action.

3.3 Quality Assurance and Sampling

All sampling and analyses performed pursuant to this Order shall conform to U.S. EPA direction, approval, and guidance regarding sampling, quality assurance/quality control ("QA/QC"), data validation, and chain of custody procedures. Respondents shall ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with U.S. EPA guidance. Upon request by U.S. EPA, Respondents shall have such a laboratory analyze samples submitted by U.S. EPA for quality assurance monitoring. Respondents shall provide to U.S. EPA the quality assurance/quality control procedures followed by all sampling teams and laboratories performing data collection and/or analysis. Respondents shall also ensure provision of analytical tracking information consistent with OSWER Directive No. 9240.0-2B, "Extending the Tracking of Analytical Services to PRP-Lead Superfund Sites."

Upon request by U.S. EPA, Respondents shall allow U.S. EPA or its authorized representatives to take split and/or duplicate samples of any samples collected by Respondents or their contractors or agents while performing work under this Order. Respondents shall notify U.S. EPA not less than 3 business days in advance of any sample collection activity. U.S. EPA shall have the right to take any additional samples that it deems necessary.

3.4 Reporting

Respondents shall submit a monthly written progress report to U.S. EPA concerning activities undertaken pursuant to this Order, beginning 30 calendar days after the date of U.S. EPA's approval of the Respondents' Work Plan, until termination of this Order, unless otherwise directed by the OSC. These reports shall describe all significant developments during the preceding period, including the work performed and any problems encountered, analytical data received during the reporting period, and developments anticipated during the next reporting period, including a schedule of work to be performed, anticipated problems, and planned resolutions of past or anticipated problems.

Any Respondent that owns any portion of the Site, and any successor in title shall, at least 30 days prior to the conveyance of any interest in real property at the Site, give written notice of this Order to the transferee and written notice of the proposed conveyance to U.S. EPA and the State. The notice to U.S. EPA and the State shall include the name and address of the transferee. The party conveying such an interest shall require that the transferee will provide access as described in Section V.4 (Access to Property and Information).

3.5 Final Report

Within 60 calendar days after completion of all removal actions required under this Order, the Respondents shall submit for U.S. EPA review a final report summarizing the actions taken to comply with this Order. The final report shall conform to the requirements set forth in Section 300.165 of the NCP. The final report shall also include a good faith estimate of total costs incurred in complying with the Order, a listing of quantities and types of materials removed, a discussion of removal and disposal options considered for those materials, a listing of the ultimate destinations of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action (e.g., manifests, invoices, bills, contracts, and permits).

The final report shall also include the following certification signed by a person who supervised or directed the preparation of that report:

Under penalty of law, I certify that, to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of this report, the information submitted is true, accurate, and complete.

4. Access to Property and Information

Respondents shall provide or obtain access as necessary to the Site and all appropriate off-site areas, and shall provide access to all records and documentation related to the conditions at the Site and the activities conducted pursuant to this Order. Such access shall be provided to U.S. EPA employees, contractors, agents, consultants, designees, representatives, and State of Illinois

representatives. These individuals shall be permitted to move freely at the Site and appropriate off-site areas in order to conduct activities which U.S. EPA determines to be necessary. Respondents shall submit to U.S. EPA, upon request, the results of all sampling or tests and all other data generated by Respondents or their contractor, or on the Respondents' behalf during implementation of this Order.

Where work under this Order is to be performed in areas owned by or in possession of someone other than Respondents, Respondents shall obtain all necessary access agreements within 14 calendar days after the effective date of this Order, or as otherwise specified in writing by the OSC. Respondents shall immediately notify U.S. EPA if, after using their best efforts, they are unable to obtain such agreements. Respondents shall describe in writing their efforts to obtain access. U.S. EPA may then assist Respondents in gaining access, to the extent necessary to effectuate the response activities described herein, using such means as U.S. EPA deems appropriate.

5. Record Retention, Documentation, Availability of Information

Respondents shall preserve all documents and information, in their possession or the possession of their contractors, subcontractors or representatives, relating to work performed under this Order, or relating to the hazardous substances found on or released from the Site, for six years following completion of the removal actions required by this Order. At the end of this six year period and at least 60 days before any document or information is destroyed, Respondents shall notify U.S. EPA that such documents and information are available to U.S. EPA for inspection, and upon request, shall provide the originals or copies of such documents and information to U.S. EPA. In addition, Respondents shall provide documents and information retained under this Section at any time before expiration of the six year period at the written request of U.S. EPA. Any information that Respondents are required to provide or maintain pursuant to this Order is not subject to the Paperwork Reduction Act of 1995, 44 U.S.C. §3501 et seq.

6. Off-Site Shipments

All hazardous substances, pollutants or contaminants removed off-site pursuant to this Order for treatment, storage or disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 CFR §300.440, 58 Fed. Reg. 49215 (Sept. 22, 1993).

7. Compliance With Other Laws

All actions required pursuant to this Order shall be performed in accordance with all applicable local, state, and federal laws and regulations except as provided in Section 121(e) of CERCLA and 40 CFR §300.415(j). In accordance with 40 CFR §300.415(j), all on-site actions required pursuant to this Order shall, to the extent practicable, as determined by U.S. EPA, considering the exigencies of the situation, attain applicable or relevant and appropriate requirements under

federal environmental or state environmental or facility siting laws.

8. Emergency Response and Notification of Releases

If any incident, or change in Site conditions, during the activities conducted pursuant to this Order causes or threatens to cause an additional release of hazardous substances from the Site or an endangerment to the public health, welfare, or the environment, the Respondents shall immediately take all appropriate action to prevent, abate or minimize such release, or endangerment caused or threatened by the release. Respondents shall also immediately notify the OSC or, in the event of his/her unavailability, shall notify the Regional Duty Officer, Emergency Response Branch, Region 5 at (312) 353-2318, of the incident or Site conditions.

Respondents shall submit a written report to U.S. EPA within 7 business days after each release, setting forth the events that occurred and the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release and to prevent the reoccurrence of such a release. Respondents shall also comply with any other notification requirements, including those in Section 103 of CERCLA, 42 U.S.C. §9603, and Section 304 of the Emergency Planning and Community Right-To-Know Act, 42 U.S.C. §11004.

VI. AUTHORITY OF THE U.S. EPA ON-SCENE COORDINATOR

The OSC shall be responsible for overseeing the implementation of this Order. The OSC shall have the authority vested in an OSC by the NCP, including the authority to halt, conduct, or direct any work required by this Order, or to direct any other response action undertaken by U.S. EPA or Respondents at the Site. Absence of the OSC from the Site shall not be cause for stoppage of work unless specifically directed by the OSC.

U.S. EPA and Respondents shall have the right to change their designated OSC or Project Coordinator. U.S. EPA shall notify the Respondents, and Respondents shall notify U.S. EPA, as early as possible before such a change is made, but in no case less than 24 hours before such a change. Notification may initially be made orally, but shall be followed promptly by written notice.

VII. PENALTIES FOR NONCOMPLIANCE

Violation of any provision of this Order may subject Respondents to civil penalties of up to \$32,500 per violation per day, as provided in Section 106(b)(1) of CERCLA, 42 U.S.C. §9606(b)(1) and as adjusted by 69 Fed. Reg. 7121-27 (Feb. 13, 2004) (codified at 40 C.F.R. § 19.4) pursuant to the Debt Collection Improvement Act of 1996. Respondents may also be subject to punitive damages in an amount up to three times the amount of any cost incurred by the United States as a result of such violation, as provided in Section 107(c)(3) of CERCLA.

42 U.S.C. §9607(c)(3). Should Respondents violate this Order or any portion hereof, U.S. EPA may carry out the required actions unilaterally, pursuant to Section 104 of CERCLA, 42 U.S.C. §9604, and/or may seek judicial enforcement of this Order pursuant to Section 106 of CERCLA, 42 U.S.C. §9606.

VIII. REIMBURSEMENT OF COSTS

Respondents shall reimburse U.S. EPA, upon written demand, for all response costs incurred by the United States in overseeing Respondents' implementation of the requirements of this Order. U.S. EPA may submit to Respondents on a periodic basis a bill for all response costs incurred by the United States with respect to this Order. U.S. EPA's Itemized Cost Summary, or such other summary as certified by U.S. EPA, shall serve as the basis for payment.

Respondents shall remit payment for the demanded amount, within 30 days of receipt of the bill of those costs, made payable to the "Hazardous Substance Superfund." Interest shall accrue from the later of the date that payment of a specified amount is demanded in writing or the date of the expenditure. The interest rate is the rate established by the Department of the Treasury pursuant to 31 U.S.C. § 3717 and 4 C.F.R. § 102.13.

Payment shall be made to U.S. EPA by electronically by either Electronic Funds Transfer ("EFT"), payment via the Automated Clearinghouse (ACH) for U. S. currency, or payment on line at the U. S. Department of Treasury website(www.pay.gov) in accordance with current procedures that U.S. EPA Region 5 will provide Respondents*, and shall be accompanied by a

*Currently, the fedwire message and payment should be sent to:

Federal Reserve Bank of New York

ABA = 021030004

Account = 68010727

SWIFT address = FRNYUS33

33 Liberty Street

New York NY 10045

The Field Tag 4200 of the Fedwire message should read " D 68010727 Environmental Protection Agency "

Payments via ACH are to

PNC Bank

308 17th Street, NW

Washington, DC 20074

Contact – Jesse White 301-887-6548

ABA = 051036706

statement identifying the name and address of the party(ies) making payment, the Site name, U.S. EPA Region 5, and the Site/Spill ID Number B5X4 and, if any, the U.S. EPA docket number for this action. When the Response Costs identified in the above paragraph are less than \$10,000, payment may, in lieu of the described electronic methods, be made by certified or cashier's check made payable to "U.S. EPA Hazardous Substance Superfund." Each check, or a letter accompanying each check, shall identify the name and address of the party(ies) making payment, the Site name, and Site/Spill ID Number B5X4, and the U.S. EPA docket number for this action, and shall be sent to:

U.S. Environmental Protection Agency
Superfund Payments
Cincinnati Finance Center
PO Box 979076
St. Louis, MO 63197-9000

Respondents shall simultaneously transmit a copy of the check to the Director, Superfund Division, U.S. EPA Region 5, 77 West Jackson Blvd., Chicago, Illinois, 60604-3590. Payments shall be designated as "Response Costs - RRG/Clayton Site" and shall reference the payers' name(s) and addresses, the U.S. EPA site identification number (B5X4), and the docket number of this Order.

Interest at a rate established by the Department of the Treasury pursuant to 31 U.S.C. §3717 and 4 CFR §102.13 shall begin to accrue on the unpaid balance from the day after the expiration of the 30 day period notwithstanding any dispute or an objection to any portion of the costs.

IX. RESERVATION OF RIGHTS

Nothing herein shall limit the power and authority of U.S. EPA or the United States to take, direct, or order all actions necessary to protect public health, welfare, or the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants or contaminants, or hazardous or solid waste on, at, or from the Site. Further, nothing herein shall prevent U.S. EPA from seeking legal or equitable relief to enforce the terms of this Order. U.S. EPA also reserves the right to take any other legal or equitable action as it deems appropriate and necessary, or to require the Respondents in the future to perform additional activities pursuant to CERCLA or any other applicable law.

Transaction Code 22 - checking
Environmental Protection Agency
Account 310006
CTX Format

Payment via www.pay.gov should be by a form found by entry of "sfo 1.1" in a search entry box available on the website.

X. OTHER CLAIMS

By issuance of this Order, the United States and U.S. EPA assume no liability for injuries or damages to persons or property resulting from any acts or omissions of Respondents. The United States or U.S. EPA shall not be a party or be held out as a party to any contract entered into by the Respondents or their directors, officers, employees, agents, successors, representatives, assigns, contractors, or consultants in carrying out activities pursuant to this Order. Each party shall bear its own costs and attorneys fees in connection with the action resolved by this Order.

This Order does not constitute a pre-authorization of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. §9611(a)(2).

Nothing in this Order constitutes a satisfaction of or release from any claim or cause of action against the Respondents or any person not a party to this Order, for any liability such person may have under CERCLA, other statutes, or the common law, including but not limited to any claims of the United States for costs, damages and interest under Sections 106(a) or 107(a) of CERCLA, 42 U.S.C. §§9606(a), 9607(a).

XI. MODIFICATIONS

Modifications to any plan or schedule may be made in writing by the OSC or at the OSC's oral direction. If the OSC makes an oral modification, it will be memorialized in writing within 7 business days; however, the effective date of the modification shall be the date of the OSC's oral direction. The rest of the Order, or any other portion of the Order, may only be modified in writing by signature of the Director, Superfund Division, Region 5.

If Respondents seek permission to deviate from any approved plan or schedule, Respondents' Project Coordinator shall submit a written request to U.S. EPA for approval outlining the proposed modification and its basis.

No informal advice, guidance, suggestion, or comment by U.S. EPA regarding reports, plans, specifications, schedules, or any other writing submitted by the Respondents shall relieve Respondents of their obligations to obtain such formal approval as may be required by this Order, and to comply with all requirements of this Order unless it is formally modified.

XII. NOTICE OF COMPLETION

After submission of the Final Report, Respondents may request that U.S. EPA provide a Notice of

Completion of the work required by this Order. If U.S. EPA determines, after U.S. EPA's review of the Final Report, that all work has been fully performed in accordance with this Order, except for certain continuing obligations required by this Order (e.g., record retention), U.S. EPA will provide written notice to the Respondents. If U.S. EPA determines that any removal activities have not been completed in accordance with this Order, U.S. EPA will notify the Respondents, provide a list of the deficiencies, and require that Respondents modify the Work Plan to correct such deficiencies. The Respondents shall implement the modified and approved Work Plan and shall submit a modified Final Report in accordance with the U.S. EPA notice. Failure to implement the approved modified Work Plan shall be a violation of this Order.

XIII. ACCESS TO ADMINISTRATIVE RECORD

The Administrative Record supporting these removal actions is available for review during normal business hours in the U.S. EPA Record Center, Region 5, 77 W. Jackson Blvd., Seventh Floor, Chicago, Illinois. Respondents may contact Tom Turner, Assistant Regional Counsel, at (312) 886-6613 to arrange to review the Administrative Record. An index of the Administrative Record is attached to this Order.

XIV. OPPORTUNITY TO CONFER

Within 3 business days after issuance of this Order, Respondents may request a conference with U.S. EPA. Any such conference shall be held within 5 business days from the date of the request, unless extended by agreement of the parties. At any conference held pursuant to the request, Respondents may appear in person or be represented by an attorney or other representative.

If a conference is held, Respondents may present any information, arguments or comments regarding this Order. Regardless of whether a conference is held, Respondents may submit any information, arguments or comments (including justifications for any assertions that the Order should be withdrawn against a Respondent), in writing to U.S. EPA within 2 business days following the conference, or within 7 business days of issuance of the Order if no conference is requested. This conference is not an evidentiary hearing, does not constitute a proceeding to challenge this Order, and does not give Respondents a right to seek review of this Order. Requests for a conference shall be directed to Tom Turner, Assistant Regional Counsel, at (312) 886-6613. Written submittals shall be directed as specified in Section V.2 of this Order.

XV. SEVERABILITY

If a court issues an order that invalidates any provision of this Order or finds that Respondents have

sufficient cause not to comply with one or more provisions of this Order, Respondents shall remain bound to comply with all provisions of this Order not invalidated by the court's order.

XVI. EFFECTIVE DATE

This Order shall be effective 10 business days following issuance unless a conference is requested as provided herein. If a conference is requested, this Order shall be effective 5 business days after the day of the conference.

IT IS SO ORDERED

BY: Richard C. Karl

Richard C. Karl, Director

Superfund Division

United States Environmental Protection Agency

Region 5

DATE: 3-5-08

WORK PLAN AMENDMENT

1.0 INTRODUCTION

1.1. GENERAL

The following is an Amendment to the Work Plan that describes those activities that are being conducted to address the presence of mixed PCBs and characteristic hazardous wastes in the excavated soils and the containment of on-site soils within the central processing area at the Site as shown on Amendment Exhibit 1. The Group will be treating the excavated soils for VOCs and lead, as appropriate, and disposing of the stockpiles according to their remaining TSCA profile. This Amendment necessarily impacts the following sections of the Work Plan: Section 4.0 - Excavation Activities, Section 5.0 - Removal Action Closeout activities, and Section 7.0 - Project Schedule.

2.0 AMENDMENTS

2.1. EXCAVATION ACTIVITIES - SOIL TREATMENT

The soils from the excavation activities completed at the site have been stockpiled. Initial disposal samples collected from the stockpiles demonstrated that stockpiles #2 through #6 had analytical results of VOCs above TCLP levels and PCBs above TSCA disposal thresholds. Stockpile 2 also had TCLP levels of lead above the RCRA disposal threshold. Stockpile #1 had neither VOCs nor PCBs and has already been properly disposed of off-site. Stockpile #7 contained no VOCs above TCLP levels, but did contain PCBs. See Table 1.

Based upon updated sampling, as shown in Table 2, Stockpiles 2, 4 and 5C will be treated, as necessary, for VOC components using chemical oxidation, as described below. Stockpile 2 will also undergo lead stabilization prior to disposal, as described below. It is estimated that approximately 1000 tons (700 cubic yards (yd³)) of soil will undergo chemical oxidation and/or lead stabilization. Soils with VOCs and lead below the TCLP levels for those constituents, including both treated materials and the remaining stockpiles on-site, will be shipped off-site in accordance with Work Plan Section 3.6.6 to a TSCA approved landfill. The stockpiles are currently underlain by plastic. Loading of the stockpiles for treatment and disposal will include some limited scraping of soils underlying the plastic, as is customary. No further excavation of on-site soils will be conducted. Further soil sampling will be limited to sampling of treated, stockpiled soils to confirm the adequacy of their treatment, as described in sections 2.1.1 and 2.1.2, below.

2.1.1 Chemical Oxidation

The chemical oxidation treatment process will take place within four mix boxes of 40 yd³ capacity each. For each batch, 25 yd³ of soil will be loaded into each mix box for processing. The oxidizing reagent (potassium permanganate) will be added to each batch of soils simultaneously with water, the soils will be mixed, and then the 4 soil batches will be staged into a single covered stockpile on plastic for overnight reaction. Processing time within the mix boxes for each batch is estimated at two and one-half hours. Following

overnight reaction time, samples will be collected from the staging piles for TCLP analysis for all RCRA TCLP VOCs. Analysis of the samples is estimated to be complete within 3-4 days. Following confirmation of treatment to below applicable TCLP levels, the soils will be loaded for disposal. Appropriate measures will be taken to control material during the transfer process for treatment. During the various soil loading processes, a fine water mist will be used, as necessary, to control dust. During the chemical addition and mixing processes, the addition of water will be necessary to facilitate oxidation, so the soils will be kept moist.

2.1.2 - Lead Stabilization

The lead stabilization process will be conducted in place at the location of Stockpile #2. A reagent, Enviroblend, a mixture of magnesium oxide and calcium phosphates, will be added to the pile and mixed in as it is added. A fine water mist will be directed onto the stockpile during the addition of the reagent. Following thorough mixing, samples will be collected and analyzed for TCLP lead. Analysis of the samples is estimated to be complete within 3-4 days. Following confirmation of adequate stabilization, the soils will be treated for VOCs via chemical oxidation, as described in section 2.1.1., above.

2.2. PROJECT SCHEDULE FOR SOIL TREATMENT

Treatment of the soil has begun. The on-site treatment and off-site shipment of the soils and backfilling of the site is anticipated to continue for approximately eight (8) weeks, assuming that once through treatment of the stockpiled soils will be adequate and that weather conditions will be amenable to the treatment technology. The need for further treatment or poor weather conditions may extend this schedule. Please note that this project timeline is based on an assumed waste shipment rate of 250 tons per day (10 trucks each with 25 tons). The availability of approved waste hauling vehicles and the ability to schedule and load those vehicles on a consistent basis throughout the project has the ability to affect the project timeline.

2.3. REMOVAL ACTION CLOSEOUT - CAP INSTALLATION

EPA intends to issue a Unilateral Administrative Order to pursue certain recalcitrant parties for construction of a cap and implementation of a cap operations and maintenance ("O&M") plan at the Site. EPA will utilize its enforcement authorities under that Order to assure performance of the required cap construction and O&M activities. However, EPA retains its enforcement discretion in all matters involving removal actions at the Site. The PRP Group will not be relieved of such responsibility, and in the event the other parties fail to perform some or all of the cap construction and O&M plan, EPA may seek to hold the PRP Group responsible for any outstanding cap obligations.

A notice of completion of work will be issued by the OSC following completion of construction of the cap and approval of the O&M plan.

TABLE 1

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES											
	RCRA Toxic Concentration/TSCA Threshold										
Sample Date		3/24/2006	3/31/2006	3/31/2006	4/6/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Sample Time		1430	1100	1200	1800	1400	1430	1430	1500	1530	1600
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCLP Metals											
Arsenic	5.0	NA	0.013	0.0052	0.009	ND	NA	NA	ND	NA	ND
Barium	100.0	NA	0.96	1.2	0.44	0.91	NA	NA	1.9	NA	0.84
Cadmium	1.0	NA	0.045	0.23	0.075	0.1	NA	NA	0.18	NA	0.046
Chromium	5.0	NA	0.05	0.067	0.015	0.031	NA	NA	0.067	NA	ND
Lead	5.0	NA	18	1.2	1.1	0.31	NA	NA	1.5	NA	0.47
Selenium	1.0	NA	0.0044	0.0096	ND	ND	NA	NA	ND	NA	ND
Silver	5.0	NA	0.0027	ND	0.017	ND	NA	NA	ND	NA	ND
Mercury	0.2	NA	ND	0.00015	ND	ND	NA	NA	ND	NA	ND
PCBs											
Aroclor 1016		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1221		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1232		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1242		1.2	50	2400	20	NA	510	360	NA	25	35
Aroclor 1248		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1254		0.95	40	680	33	NA	220	77	NA	25	15
Aroclor 1260		0.46	11	ND	21	NA	ND	43	NA	21	17
Total	90	2.67	101	3080	74	NA	730	480	NA	155	65

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES											
	RCRA Toxic Concentration/TSCA Threshold										
Sample Date		3/29/2006	3/31/2006	3/31/2006	4/4/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Sample Time		1430	1100	1200	1400	1400	1410	1430	1300	1400	1400
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCLP SEMI-VOLATILE ORGANIC COMPOUNDS											
2,4,5-Trichlorophenol	400.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2,4,6-Trichlorophenol	2.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2,4-Dinitrophenol	0.13	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2-Methylphenol	200.0	NA	0.0074	ND	NA	ND	NA	NA	0.02	NA	ND
3,4-Methylphenol	400.0	NA	0.024	0.008	NA	ND	NA	NA	0.024	NA	0.025
Monochlorobenzene	0.13	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Monochlorobutadiene	0.5	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Monochloroethane	3.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Nitrobenzene	2.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Pentachlorophenol	100.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Pyridine	5.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRC/CLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES											
RCFA Toxic Concentration/TSCA Threshold											
Sample Date		3/24/2006	3/31/2006	3/31/2006	4/6/2006	4/14/2006	4/14/2006	4/14/2006	4/14/2006	4/14/2006	4/14/2006
Sample Time		1430	1100	1200	1000	1400	1410	1430	1300	1330	1300
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCDF VOLATILE ORGANIC COMPOUNDS											
1,1-Dichloroethane	1.7	NA	0.34	ND	0.44	ND	NA	NA	ND	NA	ND
1,2-Dichloroethane	0.5	NA	4.3	ND	2.0	ND	NA	NA	0.04	NA	ND
1,4-Dichlorobenzene	7.5	NA	0.96	3.5	1.0	1.20	NA	NA	4.0	NA	3.3
Benzene	0.5	NA	6.6	0.17	3.6	0.05	NA	NA	1.5	NA	0.07
Carbon Tetrachloride	0.5	NA	ND	ND	ND	ND	NA	NA	ND	NA	ND
Chlorobenzene	100.0	NA	3.1	3.0	3.0	0.51	NA	NA	11	NA	0.84
Chloroform	6.0	NA	6.6	ND	3.9	ND	NA	NA	0.01	NA	0.03
Methyl ethyl ketone	200.0	NA	1.6	ND	1.6	ND	NA	NA	0.63	NA	0.067
Tetrachloroethylene	0.7	NA	3.1	2.7	2.2	0.74	NA	NA	1.7	NA	0.03
Trichloroethylene	0.5	NA	45	6.4	29	0.58	NA	NA	2.2	NA	0.008
Vinyl chloride	0.2	NA	ND	ND	ND	ND	NA	NA	ND	NA	ND
TCDF PESTICIDES											
Chlordane	0.003	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Endrin	0.020	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
gamma-BHC	0.4	NA	ND	0.001	NA	ND	NA	NA	ND	NA	ND
Heptachlor	0.008	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Heptachlor epoxide	0.008	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Methoxychlor	10.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Toxaphene	0.5	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES											
Sample Date Sample Time New Sample ID New Sample Depth PID Reading Parameter	RCRA Toxic Concentration/TSCA Threshold										
		3/24/2006	3/31/2006	3/31/2006	4/9/2006	4/19/2006	4/19/2006	4/19/2006	4/19/2006	4/19/2006	4/19/2006
		1430	1150	1200	1600	1600	1430	1430	1900	1800	1600
		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
TCLP HERBICIDES											
2,4,5-TP	1.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2,4-D	10.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
GENERAL CHEMISTRY											
Cyanide		ND	3.0	4.1	0.75	6.8	NA	NA	7.0	NA	3.5
Reactive Sulfide		4.4	3.3	9.8	7.1	ND	NA	NA	ND	NA	ND
Phenolics		1.6	11	25	38	25	NA	NA	45	NA	16
Palm Filter Test		ND	ND	ND	ND	PASS	NA	NA	PASS	NA	PASS
pH		6.9	6.4	6.8	6.4	7.0	NA	NA	7.3	NA	7.2
Acidity		>60	NA	NA	NA	>60	NA	NA	>60	NA	>60
Extractable Organic Halides		ND	150	780	640	445	NA	NA	1,500	NA	2,220
Percent Moisture		11	NA	NA	NA	10.3	11.7	11.1	11.5	13.8	10.0

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is from samples collected during 2005-06 Removal Action efforts.
3. Analytical data shown is being evaluated against the IEPA Soil Remediation Objectives for Commercial/Industrial Properties, Construction Worker values (IEPA Construction Workers SROs).
4. IEPA Construction Workers SROs (column 8) are bolded and italicized for emphasis.
5. Shaded cells are to indicate specific compounds from 2001 Site Assessment that exceeded the evaluation standard (the EPA Region 9 Preliminary Remediation Goals (PRGs).
6. Shaded and bolded cells represent data that exceeded the IEPA Construction Worker SRO.
7. NR means data was requested but not reported.
8. Blank cells means data was neither requested nor reported.
9. ND means the analyte was not detected.

TABLE 2

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RSG/CLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS STOCKPILE SAMPLES									
	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		6/21/2005	6/21/2005	6/21/2005	6/21/2005	6/21/2005	6/21/2005	6/21/2005	6/21/2005
Sample Time		1405	1405	1405	1405	1405	1405	1405	1405
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 4/5	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #7
Sample ID		S-002105-CD-008	S-002105-CD-001	S-002105-CD-007	S-002105-CD-002	S-002105-CD-003	S-002105-CD-003	S-002105-CD-011	S-002105-CD-011
No. of Sample Aliquots		8	14	12 (8 from 4, 4 from 5B)	4	4 (2 from each sub-pile)	5	16	16
Parameter									
TCMP Metals									
As	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Ba	100.0	NA	NA	NA	NA	NA	NA	NA	NA
Cd	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Co	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Cu	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Mn	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Pb	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Mo	0.2	NA	NA	NA	NA	NA	NA	NA	NA
PCBs									
Ar 1016		ND	ND	ND	ND	ND	ND	ND	ND
Ar 1221		ND	ND	ND	ND	ND	ND	ND	ND
Ar 1232		ND	ND	ND	ND	ND	ND	ND	ND
Ar 1242		15	1300	72	37	640	240	58	ND
Ar 1248		ND	ND	ND	ND	ND	ND	ND	ND
Ar 1254		20	390	27	97	180	92	58	1.7
Ar 1260		ND	ND	ND	ND	ND	ND	3.7	ND
Totals	50.0	15	1540	99	154	1120	382	165	1.7
Overall Totals		101	3080	74	NA	730	680	155	60
Overall Sample Aliquots		12	14	12	4	12	17	min - 26, 68 - 12 (1/10 only)	12
SEMIVOLATILE ORGANIC COMPOUNDS									
2,4-Dichlorobenzene	600.0	ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorophenol	2.0	ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorobenzene	0.13	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	200.0	ND	ND	ND	ND	ND	ND	ND	ND
Methylphenol	600.0	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	0.13	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	0.5	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	3.0	ND	ND	ND	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	2.0	ND	ND	ND	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	100.0	ND	ND	ND	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	5.0	ND	ND	ND	ND	ND	ND	ND	ND

STOCKPILE SAMPLES

[illegible]

RESOURCES RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RUG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

[illegible]

RELATE REMOVAL ACTION ANALYTICAL RESULTS

[illegible]

RESOURCE RECOVERY CORP./CLAYTON CHEMICAL COMPANY (RRC)/CLAYTON SITE									
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS									
STOCKPILE SAMPLES									
	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		9/21/2006	9/21/2006	9/21/2006	9/21/2006	9/21/2006	9/21/2006	9/21/2006	9/21/2006
Sample Time		1405	1405	1405	1405	1405	1405	1405	1405
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 4/56	Stockpile #5	Stockpile #58	Stockpile #5C	Stockpile #6	Stockpile #7
Sample ID		S-002196-CD-006	S-002196-CD-007	S-002196-CD-007	S-002196-CD-002	S-002196-CD-009	S-002196-CD-003	S-002196-CD-012	S-002196-CD-011
Nr. of Sample Aliquots		6	16	12 (5 from 4, 4 from 60)	6	4 (2 from each sub-pile)	6	16	16
Trichloroethene		14	15	110	0.98	15	34	9.8	ND
Trichloroethylene		ND	ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloro-1,1,2-trifluoroethane		ND	ND	ND	ND	ND	ND	ND	ND
Methyl chloride		ND	ND	ND	ND	ND	ND	ND	ND
Acetone		22	ND	65	ND	1.4	41	27	ND
Total VOCs (mg/kg)		216.64	211.83	665.3	0.62	516	21429.99	799.96	157.95
Sw. Liquid Volume - max. (liters)		350	250	600	300	100	100	600	225
Sw. Liquid Volume - max. (kg)		317.515	226.796	562.874	181.437	90.718	90.718	599.670	204.117
Max. VOCs (kg)		68	68	234	7.91	67	19,600	672	53
Max. VOCs (lbm)		0.075	0.083	0.258	0.009	0.052	21.608	0.830	0.058
PCP PESTICIDES									
Dieldrin	0.003	NA	NA	NA	NA	NA	NA	NA	NA
Endrin	0.010	NA	NA	NA	NA	NA	NA	NA	NA
gamma-BHC	0.4	NA	NA	NA	NA	NA	NA	NA	NA
delta-BHC	0.006	NA	NA	NA	NA	NA	NA	NA	NA
gamma-BHC isomer	0.006	NA	NA	NA	NA	NA	NA	NA	NA
delta-BHC isomer	10.0	NA	NA	NA	NA	NA	NA	NA	NA
gamma-BHC isomer	0.5	NA	NA	NA	NA	NA	NA	NA	NA
CLP HERBICIDES									
ATP	1.0	NA	NA	NA	NA	NA	NA	NA	NA
ATD	10.0	NA	NA	NA	NA	NA	NA	NA	NA
GENERAL CHEMISTRY									
Ammonia		NA	NA	NA	NA	NA	NA	NA	NA
Acetic Acid		NA	NA	NA	NA	NA	NA	NA	NA
Isocyanates		NA	NA	NA	NA	NA	NA	NA	NA
Ammonia Test		NA	NA	NA	NA	NA	NA	NA	NA
H ₂		NA	NA	NA	NA	NA	NA	NA	NA
Ammonia		NA	NA	NA	NA	NA	NA	NA	NA
Ammonia/Oxygen Balances		NA	NA	NA	NA	NA	NA	NA	NA
Ammonia Moisture			15	12	8.0	11.0	12.0	8.9	13

Notes:

- All concentrations are reported in parts per million.
- Analytical data shown is from samples collected during 2002-08 Removal Action efforts.
- Analytical data shown is being evaluated against the RCRA Toxicity thresholds, and TSCA threshold values.
- Evaluation standards (column 1) are bolded for emphasis.
- A dash (-) in column 8 indicates that no evaluation threshold was found.
- NA indicates data that exceeded the applicable evaluation threshold value.
- NA means data is not available for.
- Blank or no data was neither requested nor reported.
- ND means the analysis is not detected.

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE								
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS								
STOCKPILE SAMPLES								
	RCRA Toxic Concentration/TECA Threshold							
Sample Date		9/25/2005	9/29/2005	9/29/2005	9/29/2005	9/29/2005	9/29/2005	9/29/2005
Sample Time		1325	1530	1530	1530	1530	1530	1530
Stockpile #		Stockpile # CP-40P-6	Stockpile # GC	Stockpile # TP-40/OC	Stockpile # TP-54	Stockpile # CP-30	Stockpile # TP-30/TP-55	Stockpile # TP-47
Sample ID		S-002286-CD-004	S-002286-CD-005	S-002286-CD-006	S-002286-CD-009	S-002286-CD-013	S-002286-CD-004	S-002286-CD-005
No. of Sample Aliquots		3	2	6	2	2	8	2
Parameters								
TCLP Metals								
Arsenic	5.0	NA	NA	NA	NA	NA	NA	NA
Barium	100.0	NA	NA	NA	NA	NA	NA	NA
Cadmium	1.0	NA	NA	NA	NA	NA	NA	NA
Chromium	5.0	NA	NA	NA	NA	NA	NA	NA
Copper	5.0	NA	NA	NA	NA	NA	NA	NA
Lead	5.0	NA	NA	NA	NA	NA	NA	NA
Selenium	1.0	NA	NA	NA	NA	NA	NA	NA
Silver	5.0	NA	NA	NA	NA	NA	NA	NA
Mercury	0.2	NA	NA	NA	NA	NA	NA	NA
PCBs								
Aroclor 1016		ND	ND	ND	ND	ND	ND	ND
Aroclor 1221		ND	ND	ND	ND	ND	ND	ND
Aroclor 1232		ND	ND	ND	ND	ND	ND	ND
Aroclor 1242		1.3	0.09	ND	ND	64	ND	ND
Aroclor 1248		ND	ND	ND	ND	ND	ND	ND
Aroclor 1254		1.1	ND	ND	1.1	30	0.37	0.042
Aroclor 1260		ND	ND	ND	ND	34	ND	ND
Total	50.0	2.4	0.09	ND	1.1	128	0.37	0.042
Original Totals								
Original Sample Aliquots								
TCLP SEMI-VOLATILE ORGANIC COMPOUNDS								
2,3,5-Trichlorobenzene	600.0	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorobenzene	2.0	ND	ND	ND	ND	ND	ND	ND
2,4-Dinitrochlorobenzene	0.12	ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorobenzene	300.0	ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorophenol	600.0	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	0.12	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	0.5	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	3.0	ND	ND	ND	ND	ND	ND	ND
Nitrobenzene	2.0	ND	ND	ND	ND	ND	ND	ND
Phenylacetylene	100.0	ND	ND	0.041	ND	ND	ND	ND
Pyridine	5.0	ND	ND	ND	ND	ND	ND	ND

Total VOCs

RESPONSE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (BIO/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

[illegible]

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (BIOCLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS STOCKPILE SAMPLES								
	RCRA Toxic Concentration/TCCA Threshold							
Sample Date		07/28/2004	07/28/2004	07/28/2004	07/28/2004	07/28/2004	07/28/2004	07/28/2004
Sample Time		1525	1530	1600	1600	1600	1600	1600
Stockpile #		Stockpile # CP-4/GP-4	Stockpile # CC	Stockpile TP-SQ/UC	Stockpile # TP-SH	Stockpile # CP-30	Stockpile # TP-SQ/TP-25	Stockpile # TP-GF
Sample ID		S-002286-CD-004	S-002286-CD-005	S-002286-CD-006	S-002286-CD-008	S-002286-CD-013	S-002286-CD-014	S-002286-CD-015
No. of Sample Aliquots		3	2	6	2	2	1	2
2-Chloroaniline		ND	ND	ND	ND	ND	ND	ND
2-Nitroaniline		ND	ND	ND	ND	ND	ND	ND
2-Toluene thiolate		ND	ND	ND	ND	ND	ND	ND
2,4-Dinitroaniline		ND	ND	ND	ND	ND	ND	ND
Aniline		ND	ND	ND	ND	ND	ND	ND
Nitrobenzene		ND	ND	ND	ND	ND	ND	ND
Benzothiazole		ND	ND	ND	ND	ND	ND	ND
Picoline		ND	ND	ND	ND	ND	ND	ND
2-(2-Chlorophenyl)-2-propanol		ND	ND	ND	ND	ND	ND	ND
2-Methoxyphenol		ND	ND	ND	ND	ND	ND	ND
2-Methylphenol		ND	ND	ND	ND	ND	ND	ND
2'-methyl-2-chloropropene		ND	ND	ND	ND	ND	ND	ND
Anisole		ND	ND	ND	ND	ND	ND	ND
Nitrobenzotrifluoride		ND	ND	ND	ND	ND	ND	ND
Nitrobenzene		ND	ND	ND	ND	ND	ND	ND
Benzoic acid		ND	ND	ND	ND	ND	0.14	ND
2,4-Dichlorophenol		ND	ND	ND	ND	ND	ND	ND
2,4-Dimethylphenol		ND	ND	ND	ND	ND	ND	ND
2-(2-Chlorophenyl)-2-propanol		ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorophenol		ND	ND	ND	ND	ND	ND	ND
Total SVOC's (mg/kg)		9.22	77.4	78.79	1.538	78.79	9.363	3.16
Stitching Volume - max (tons)		71	75	112.5	7.5	12	130	15
Stockpile Volume - max (cuy)		27,216	68,079	102,158	4,814	10,886	109,662	17,438
Max SVOC's (kg)		0.251	5.369	0.041	0.017	0.058	1.079	0.043
Min SVOC's (kg)		0.0003	0.0054	0.0049	0.000169	0.009655	0.001126	0.000675
C,F VOLATILE ORGANIC COMPOUNDS								
1,1-Dichloroethane	1.7	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethane	0.5	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethene	7.5	0.024	0.051	0.028	0.026	0.023	0.012	0.0051
Acetone	0.5	ND	0.0013	0.0042	ND	ND	ND	ND
Carbon Tetrachloride	0.5	ND	ND	ND	ND	ND	ND	ND
Dibromomethane	100.0	ND	ND	ND	ND	0.0074	0.007	ND
Dibromomethane	6.0	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	200.0	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	0.7	0.59	0.019	0.10	ND	ND	0.0099	ND
Trichlorofluorene	0.5	0.0118	0.013	0.001	ND	ND	0.016	ND
Vinyl Chloride	0.2	ND	ND	ND	ND	ND	ND	ND
Total		0.632	0.068	0.215	0.036	0.0724	0.0439	0.0051

412.99

0.45

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RIG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

[illegible]

RESOURCE RECOVERY ORGANIZATION/CLAYTON CHEMICAL COMPANY (BIOCLAYTON) SITE								
SOILS REMOVAL ACTION ANALYTICAL RESULTS								
STOCKPILE SAMPLES								
	BCRA Toxic Concentration/TSCA Threshold							
Sample Date		02/28/04	03/02/04	02/28/04	02/28/04	02/28/04	03/02/04	02/28/04
Sample Time		1325	1335	1335	140	140	145	140
Stockpile #		Stockpile # CP-5/CP-6	Stockpile # OC	Stockpile # TP-5/VOG	Stockpile # TP-5-1	Stockpile # CP-30	Stockpile # TP-5/TP-15	Stockpile # TP-5-7
Sample ID		S-002384-CD-001	S-002385-CD-005	S-002386-CD-006	S-002386-CD-010	S-002386-CD-013	S-002386-CD-014	S-002386-CD-015
No. of Sample Aliquots		3	2	4	2	2	8	2
Trichloroethene		1.1	0.8	2.5	ND	0.1	0.045	0.072
Trichloroethene/methane		ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloro-1,1,2-trifluoroethane		ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride		ND	ND	ND	ND	ND	ND	ND
Cybenz		1.1	ND	ND	1.0	0.019	0.0075	0.07
Total VOCs (mg/kg)		68.66	16.21	19.82	1.97	0.096	0.0061	1.84
Stockpile Volume - (max. (ft ³))		31	73	118.5	7.5	12	137	15
Stockpile Volume - (max. (ft ³))		27,214	60,079	102,354	4,464	10,334	100,002	13,404
Mean VOCs (ppb)		1.330	1.103	2.023	0.096	0.010	0.009	0.005
Mean VOCs (tent)		0.0013	0.0012	0.0022	0.000091	0.000045	0.000011	0.000028
ICP-PESTICIDES								
Chlordane	0.003	NA	NA	NA	NA	NA	NA	NA
Dieldrin	0.008	NA	NA	NA	NA	NA	NA	NA
γ-HCH	0.4	NA	NA	NA	NA	NA	NA	NA
Endosulfan	0.008	NA	NA	NA	NA	NA	NA	NA
Endosulfan sulfate	0.008	NA	NA	NA	NA	NA	NA	NA
γ-HCH	10.0	NA	NA	NA	NA	NA	NA	NA
γ-HCH	0.5	NA	NA	NA	NA	NA	NA	NA
ICP HERBICIDES								
2,1,5-TP	1.0	NA	NA	NA	NA	NA	NA	NA
2,1-D	10.0	NA	NA	NA	NA	NA	NA	NA
GENERAL CHEMISTRY								
Chloride		NA	NA	NA	NA	NA	NA	NA
Fluoride		NA	NA	NA	NA	NA	NA	NA
Mercury		NA	NA	NA	NA	NA	NA	NA
Paint Filter Test		NA	NA	NA	NA	NA	NA	NA
Oil		NA	NA	NA	NA	NA	NA	NA
Organic Solids		NA	NA	NA	NA	NA	NA	NA
Extraction Residue		7.8	11	6.8	5	23	7.6	4.3

All concentrations are reported as parts per million.

Absence of data shown in bar samples collected during 2016-16 Remedial Action efforts.

A yellow data shows being evaluated against the RCRA Tenity thresholds and TSCA threshold values.

Evaluation standards (column B) are based for employees

A value (-) in column B indicates that no evaluation threshold was found.

Basis to represent data that exceeds the applicable evaluation threshold value.

N/A means data was not analyzed for.

Blank or - means data was neither requested nor reported.

ND means the analyte was not detected.

DRAFT

RRG/Clayton Chemical Site
 Sauget, St. Clair County, Illinois
 Field Sample Key
 Stockpile Re-characterization/Soil Milling Field Trial

Sample Dates: August 21-23, 2006

Date	Time	Sample Identification	Location	PID Readings (ppm) (Highest Reading from Composite)	Comments
Soil Characterization Samples					
8/21/2006	1445	S-082106-GD-001	Stockpile #3	N/A	Sample composite of 16 sample locations within stockpile.
8/21/2006	1500	S-082106-GD-002	Stockpile #5	N/A	Sample composite of 6 sample locations within stockpile.
8/21/2006	1515	S-082106-GD-003	Stockpile #5C	N/A	Sample composite of 2 sample locations within stockpile.
8/21/2006	1525	S-082106-GD-004	Stockpile #GP-5/GP-6	N/A	Sample composite of 3 sample locations within stockpile.
8/21/2006	1535	S-082106-GD-005	Stockpile #GC	N/A	Sample composite of 2 sample locations within stockpile.
8/21/2006	1550	S-082106-GD-006	Stockpile #T50/GC	N/A	Sample composite of 6 sample locations within stockpile.
8/21/2006	1605	S-082106-GD-007	Stockpile #4/4B	N/A	Sample composite of 12 sample locations within stockpile.
8/21/2006	1625	S-082106-GD-008	Stockpile #2	N/A	Sample composite of 8 sample locations within stockpile.
8/22/2006	0830	S-082206-GD-009	Stockpile #5B	N/A	Sample composite of 4 sample locations within stockpile.
8/22/2006	0840	S-082206-GD-010	Stockpile #TP-54	N/A	Sample composite of 2 sample locations within stockpile.
8/22/2006	0905	S-082206-GD-011	Stockpile #7	N/A	Sample composite of 16 sample locations within stockpile.
8/22/2006	0925	S-082206-GD-012	Stockpile #6	N/A	Sample composite of 16 sample locations within stockpile.
8/22/2006	0930	S-082206-GD-013	Stockpile #TP-20	N/A	Sample composite of 2 sample locations within stockpile.
8/22/2006	0955	S-082206-GD-014	Stockpile #TP-24/TP-25	N/A	Sample composite of 8 sample locations within stockpile.
8/22/2006	1010	S-082206-GD-015	Stockpile #47	N/A	Sample composite of 3 sample locations within stockpile.

DRAFT

RRG/Clayton Chemical Site
 Sauget, St. Clair County, Illinois
 Field Sample Key
 Stockpile Re-characterization/Soil Milling Field Trial

Sample Dates: August 21-23, 2006

Date	Time	Sample Identification	Location	PID Readings (ppm) (Highest Reading from Composite)	Comments
Soil Milling Samples					
8/22/2006	1410	S-082206-GD-016	Stockpile #3	363.4	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/22/2006	1440	S-082206-GD-017	Stockpile #3- Post Treat	112.7	Post treatment sample
8/22/2006	1510	S-082206-GD-018	Stockpile #5	14.4	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/22/2006	1540	S-082206-GD-019	Stockpile #5 - Post Treat	6.8	Post treatment sample
8/22/2006	1610	S-082206-GD-020	Stockpile #4	290	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/22/2006	1620	S-082206-GD-021	Stockpile #4- Post Treat Rnd 1	12.8	Post treatment sample
8/22/2006	1640	S-082206-GD-022	Stockpile #4- Post Treat Rnd 2	580	Post treatment sample
8/23/2006	0910	S-082306-GD-023	Stockpile #2	1668	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/23/2006	0930	S-082306-GD-024	Stockpile #2 - Post Treat Rnd 1	1068	Post treatment sample
8/23/2006	0950	S-082306-GD-025	Stockpile #2 - Post Treat Rnd 2	307	Post treatment sample
8/23/2006	1010	S-082306-GD-026	Stockpile #6	907	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/23/2006	1030	S-082306-GD-027	Stockpile #6 - Post Treat Rnd 1	1362	Post treatment sample
8/23/2006	1050	S-082306-GD-028	Stockpile #6 - Post Treat Rnd 2	301	Post treatment sample

RRG/Clayton Chemical Company Superfund Site
Attachment 2

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APPENDIX A

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL SITE
SAUGET, ST. CLAIR COUNTY, ILLINOIS

UPDATE #2
JANUARY 30, 2008

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	11/05/07	Newlon, S., Dickinson Wright PLLC	U.S. EPA	Work Plan re: Installation of RCRA/TSCA Compliant Cap Over the Central Processing Area at the RRG/Clayton Chemical Site	2
2	11/05/07	Newlon, S., Dickinson Wright PLLC	U.S. EPA	Work Plan Amendment re: Excavation Activities, Removal Action Closeout Activities and the Project Schedule at the RRG/Clayton Chemical Site	2
3	01/30/08	U.S. EPA	Respondents	Second Amendment to the Administrative Settlement Agreement and Order on Consent for Removal Action at the RRG/Clayton Clayton Chemical Site (Docket No. V W 05-C-829) w/Cover Letter	25
4	00/00/00	U.S. EPA	Non-Complying Respondents	Unilateral Administrative Order on Consent for the RRG/Clayton Chemical Site (PENDING)	



U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL SITE
SAUGET, ST. CLAIR COUNTY, ILLINOIS

ORIGINAL
OCTOBER 8, 2002

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	1994-1998	Illinois EPA	File	Hazardous Waste Reports for the Clayton Chemical Site	1839
2	09/06/01	Roy F. Weston, Inc.	U.S. EPA	Removal Assessment Report for the Clayton Chemical Site (FINAL DRAFT)	287
3	03/06/02	Karl, R., U.S. EPA	Addressees	Letter re: General Notice of Potential Liability for the RRG/Clayton Chemical Site w/Attached List of Recipients	6
4	10/08/02	Turner, K., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Need to Conduct a Time-Critical Removal Action at the Resource Recovery Group/Clayton Chemical Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED)	18

DUPLICATE
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APPENDIX B

LIABILITY FILE INDEX

- | | | |
|----|---|---|
| 1. | 1994-1998 Illinois EPA | Hazardous Waste Reports
for the RRG/Clayton Chemical Site |
| 2. | September 2001 Roy F. Weston, | U.S. EPA Removal Assessment
Report for the RRG/Clayton
Chemical Site
(FINAL DRAFT) |
| 3. | October 8, 2002 | U.S. EPA Action Memorandum in
support of Removal Action for
hazardous soils |
| 4. | August 2004 RRG/Clayton Haz.
Liquids Group | Report to U.S. EPA of Total Waste
Generator Records for Site |
| 5. | November 2004 U.S. EPA | General Notice Letters to Large
Group
Generators at Site |
| 6. | September 2005; June 2006;
October 2006; and June 2007 | Warning letters to Non-Participating
Large Group Generators at Site |
| 7. | October 2005 U.S. EPA | CERCLA Administrative Settlement
Agreement and Order on Consent for
Hazardous Soils Removal |
| 8. | February 9, 2006 U.S. EPA | CERCLA Amendment to
Administrative Settlement
Agreement and Order on Consent for
Hazardous Soils Removal |
| 9. | January 30, 2008 U.S. EPA | Second Amendment to
Administrative Settlement
Agreement and Order on Consent for
Hazardous Soils Removal |